

REMARKS/ARGUMENTS

Claims 50-66 remain pending in the application at this time. Reconsideration of the application is respectfully requested in view of the following remarks.

Claims 50-52, 54-56 and 58-66 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,199,076 B1 issued March 6, 2001 to Logan et al. ("*Logan*") in view of U.S. Patent No. 6,516,299 B1 issued February 3, 2003 to Case ("*Case*"), and further in view of U.S. Patent No. 6,516,299 to Townsend ("*Townsend*"). In addition, claims 53 and 57 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Logan*, in view of *Case* and *Townsend*, and further in view of art that is not cited but asserted to be "well known" by the Examiner.

In order for the rejection of the claims under 35 U.S.C. §103(a) to be maintained, every feature recited in the claims must be taught by the cited references. Applicants respectfully submit that this requirement has not been met. Neither *Logan* nor *Case*, nor *Townsend* nor the combination thereof, teaches all of the features of the presently pending claims. Accordingly, the rejections should be withdrawn.

As now recited in the independent claims of the application, an integrated receiver decoder (IRD) device is provided which is operable to receive a compressed broadcast digital signal. The IRD device includes a receiver operable to receive a compressed broadcast digital signal transmitted thereto over a transmission medium. The IRD device further includes an MPEG audio decoder operable to decode the received compressed digital signal to provide decoded digital audio data. The IRD device further includes a first output terminal for providing the received compressed digital signal to an external device through a bi-directional data communication line, and a

second output terminal for providing decoded digital audio data to the external device through a one way data communication line.

Applicants appreciate the courtesy of the Examiner in granting the interview that was conducted on June 29, 2004. During the interview, the undersigned discussed the rejections of the claims with the Examiner, particularly in relation to the providing of a received compressed digital signal through a first bi-directional output terminal of the integrated receiver decoder (IRD), and decoded digital audio data, that is decoded from the received compressed digital data, through a second output terminal. In particular, the undersigned argued that U.S. Patent No. 6,516,299 B1 issued February 3, 2003 to Case ("*Case*") does not teach or suggest a controller for controlling an IRD device in accordance with a connection state between the IRD device and the external device, such that either the first output terminal provides the received compressed digital signal to the external device or the second output terminal provides the decoded digital audio data to the external device. The undersigned argued that *Case* does not teach or suggest the outputting of a particular signal through a particular output terminal in accordance with the connection state of the external device. While the interview is believed to have been productive, no agreement has yet been reached to allow the claims of the application.

A principle point made by the applicants concerns the teachings of *Case*. *Case* shows a system in which a processor 50 has only one output terminal 62. As shown in FIG. 3, a single one-way communication line extends from the output terminal 62. The one-way line, in turn, is connected to one of three "playback destinations" 56, 58, 60. Thus, *Case* fails to teach a *first output terminal* for providing compressed digital data on a bi-directional communication line and a *second output terminal*

for providing decoded digital data on a one-way communication line.

As discussed during the interview, applicants also disagree with the apparent contention in the Office Action that Case teaches the recited element in claim 50 of a controller that controls the device "in accordance with a *connection state between the device and an external device such that either said first output terminal provides the received compressed digital signal to the external device, or said second output terminal provides the decoded digital audio data to the external device.*"

Here, as discussed in the interview, such interpretation is not supported by a proper reading of Case. Case fails to teach or suggest more than one output terminal. There is no more than one output 62 of the processor 50 shown in FIG. 3. Nor is there any teaching or suggestion in the description of a device having more than one output terminal. Therefore, Case fails to meet the claim language on this ground alone.

Moreover, a combination of the teachings of Case with those of Logan would not result in an operative device. Since there is only one output terminal, the connection state of the one output terminal can only be "connected" or "disconnected". Such connected or disconnected state would not be capable of controlling a processor which, according to claim 50, must either provide a received compressed digital signal to an external device connected to the first output terminal (i.e., in a "first connected state"), or provide decoded digital audio data to an external device connected to a second output terminal (i.e., in a "second connected state"). The system shown in Case would have no way of distinguishing from the "connected" state whether the compressed digital signal is to be provided or the decoded audio data.

In addition, Case does not teach or suggest that the processor 50 is controlled in accordance with a *connection state* between the processor and an external device. Case merely states that processing is controlled according to a control input 54. Case neither teaches nor suggests that the control input 54 to the processor bears any relation to the connection state between the processor and the external device. The passage in Case indicated by the Examiner at col. 4, lns. 53-54 merely states that "the processor (50) also receives control input (54) for *identifying* any one of a plurality of particular destinations (56, 58, 60) where the encoded audio signal (52) will be decoded and reassembled for playback." This statement in Case does not teach or suggest controlling the operation of a device *in accordance with the connection state* between the device and an external device. Rather, the statement only refers to a control input 54 for "identifying" which one of a plurality of destinations is to decode the signal 52 output from the processor 50. As further described in Case, this type of control is performed so that the processor 50 can encode that signal accordingly. (col. 5, lns. 24-26). However, nothing in Case requires that any destination 56, 58, 60 be connected to the processor 50 at the time that the control input 54 is provided to the processor 50 or that a particular one of the three destinations 56, 58, 60 be connected to the processor. Thus, nothing in Case either teaches or suggests that the control input conveys the "connection state" to the processor.

Claims 54 and 58 contain similar recitations, and therefore, should be allowable over the cited references for the same reasons as discussed above. In addition, all other claims depend from either claim 50, claim 54 or claim 58.

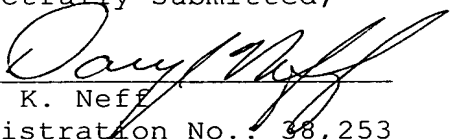
In view of the above arguments, Applicants respectfully submit that all presently pending claims are allowable over the cited art. As it is believed that all of the

rejections set forth in the Official Action have been fully met, favorable reconsideration and allowance are earnestly solicited. If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that she telephone applicants' attorney at (908) 654-5000 in order to overcome any additional objections which she might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

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Respectfully submitted,

By 
Daryl K. Neff
Registration No.: 38,253
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, New Jersey 07090
(908) 654-5000
Attorney for Applicant